

56
FEB 18 1986

Mr. Kurt E. Matthews
Associate Counsel
Wickes Companies, Inc.
3340 Ocean Park Boulevard, Suite 2000
P.O. Box 4056
Santa Monica, California 90405

Dear Mr. Matthews:

RE: Financial Requirements
Eagle Signal Controls Division
Wickes Manufacturing Company
736 Federal Street
Davenport, Iowa 52803



R00307837
RCRA RECORDS CENTER

NOTICE OF DEFICIENCY

This is in response to your letter dated November 8, 1985, in which you provided documentation of closure/post-closure assurance and sudden liability coverage for the above-referenced facility. This Agency has reviewed your submittal for compliance with Subpart H of 40 CFR 264 and 265, and have determined that it contains the following typographical errors, misquotations and deletions:

- 1) In Alternative I of your financial test letter, the dollar amounts listed for lines 3 and 4 have decimal points in place of the commas, and a digit has been left out of the amount given for line 7.
- 2) Line 14 of Alternative I has characters in both the "yes" and the "no" column, whereas in line 15, neither column is checked. Please correct these errors on your next submission.
- 3) Recital -1- on your corporate guarantee sites compliance with "...40 CFR 264,143(f), 265,143(e), and 265.145(e)." The correct quotation is "...40 CFR 264.143(f), 264.145(f), 265.143(e), and 265.145(e)."
- 4) The second line of Recital -4- contains the incorrect substitution of the word "agrees" for "guarantees."
- 5) The third line of Recital -8- begins, "...modification of the permit ..." This line should be corrected to read, "...amendment or modification of the closure or post-closure plan, amendment or modification of the permit..."

WSTM:RCRA:IOWA:DHUYETT:ch:x671:2/12/86 Disk 5

CONCURRENCES

SYMBOL	IOWA	IOWA	IOWA	RCRA
SURNAME	HUYETT	DOYLE	FLOURNOY	SANDERSON
DATE	2/13/86	2/13/86	2/13/86	2/13/86

-2-

No deficiencies were found in either the sudden liability insurance certificate or the supporting documentation that you submitted in your letter dated February 7, 1986.

A search of our files has not uncovered your closure plan. Please resubmit this plan for our review. The closure plan should be updated to include justification of your \$0.00 cost estimate for the closure and post-closure of your facility in Davenport, Iowa. Please also note that if our review of that information reveals any deficiencies in your closure plan, then more work on the closure of the facility will be required before this Agency would concur on the closure certification and terminate your interim status. In which case, your closure cost estimate and financial test letter would have to be amended.

Please correct your closure/post-closure assurance documentation in accordance with the above-mentioned deficiencies. This information, as required in 40 CFR 264.143(f)(3) and 264.145(f)(3), along with a copy of your closure plan, should be submitted within 30 days of the receipt of this letter, as per 40 CFR 270.70. Failure to submit this information within the specified time-frame may subject you to an enforcement action.

Please also note our change of address. If you have any questions regarding this letter, please contact David Huyett at (913) 236-2888.

Sincerely yours,

Michael J. Sanderson
Chief, RCRA Branch
Waste Management Division

cc: Michael J. Bauer, Resident Counsel,
Wickes Manufacturing Company, P.O. Box 999
26261 Evergreen Road, Southfield Michigan 48037

Wilhelm A. Mallory, Executive Vice President
Wickes Companies, Inc. P.O. Box 4056
3340 Ocean Park Boulevard, Suite 2000
Santa Monica, California 90405

Lane Trefftz
Eagle Signal Industrial Controls
736 Federal Street
Davenport, IA 52803

Darryl McAllister, IDWAWM

CONCURRENCES

SYMBOL	cc: Dave Doyle, RCRA/IOWA					
SURNAME						
DATE						